

JASON M. FRIERSON
United States Attorney
District of Nevada
Nevada Bar No. 7709
PATRICK A. ROSE
Assistant United States Attorney
Nevada Bar No. 5109
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336
patrick.rose@usdoj.gov

Attorneys for Federal Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Norma Portillo Lazo,

Plaintiff,

v.

Merrick B. Garland, U.S. Attorney General;
Alejandro Mayorkas, DHS Secretary; Ur. M.
Jaddou, Director of U.S. Citizenship and
Immigration Services; David M. Douglas,
District Director United States Citizenship
and Immigration Services; Clyde Moore,
Field Office Director for U.S. Citizenship
and Immigration Services Las Vegas Office;
John Doe,

Defendants.

Case No. 2:22-cv-00454-CDS-BNW

Motion for Extension of Time

(Fourth Request)

Federal Defendants, through undersigned counsel, move for a 45-day extension of time from December 5, 2022, to January 19, 2023, for Federal Defendants to file a response to the Complaint, ECF No. 1. This is the fourth request for an extension of time. The previous three requests were made by stipulation. Plaintiff's counsel and defense counsel exchanged emails today agreeing generally to another extension. However, as it nears the close of business today, defense counsel has not heard back from Plaintiff's counsel about authority to e-sign the draft stipulation that was sent to Plaintiff's counsel and is attached hereto.

1 Federal Rule of Civil Procedure 6(b)(1) and Local Rule IA 6-1 allow a party to
2 request additional time to perform an act. Without waiver of any positions, Federal
3 Defendants advise of the following: during the prior extension, there was a positive
4 development in immigration court that could obviate the needs for (i) Federal Defendants
5 to prepare and file a formal response to the Complaint and (ii) the parties to prepare and
6 file substantive briefs. However, Plaintiff has not yet received the applicable, official notice
7 from the United States Citizenship and Immigration Services. That notice is expected in
8 the near future. As a result, the parties may be able to file a stipulated dismissal of this
9 matter by the time of the January 19, 2023 extension-date requested herein.

10 This motion is filed in good faith and not for the purposes of undue delay.


11 Respectfully submitted this 5th day of December 2022.

12 JASON M. FRIERSON
13 United States Attorney

14 /s/ Patrick A. Rose
15 PATRICK A. ROSE
16 Assistant United States Attorney

17 **ORDER**

18 For good cause shown, IT IS ORDERED
19 that ECF No. 18 is GRANTED.

20 IT IS SO ORDERED
21 DATED: 2:31 pm, December 06, 2022
22 
23 BREND A WEKSLER
24 UNITED STATES MAGISTRATE JUDGE
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